



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



PAUL R. LEPAGE
GOVERNOR

PATRICIA W. AHO
COMMISSIONER

**International Paper Company
Androscoggin County
Auburn, Maine
A-461-71-M-M**

**Departmental
Findings of Fact and Order
Air Emission License
Amendment #2**

FINDINGS OF FACT

After review of the air emissions license amendment application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 Maine Revised Statutes Annotated (M.R.S.A.), §344 and §590, the Maine Department of Environmental Protection (Department) finds the following facts:

I. REGISTRATION

A. Introduction

International Paper Company (IP) was issued Air Emission License A-461-71-K-R/A on April 6, 2012, permitting the operation of emission sources associated with their corrugated container manufacturing facility. The license was subsequently amended on December 12, 2012 (A-461-71-L-A).

IP has requested a minor revision to their license in order to reflect the removal and replacement of the existing two color Flexo Folder Gluer with a new three color Flexo Folder Gluer.

The equipment addressed in this license is located at 175 Allied Road in Auburn, Maine.

B. Emission Equipment

The following equipment is addressed in this air emission license:

Process Equipment

<u>Equipment</u>	<u>Production Rate</u>	<u>Stack #</u>
Printing Inks:		
two color Flexo Fold Gluer (R)	N/A	N/A
three color Flexo Fold Gluer (N)	N/A	N/A

(R) Denotes equipment removed from license
(A) Denotes new equipment added to license

AUGUSTA
17 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0017
(207) 287-7688 FAX: (207) 287-7826
RAY BLDG., HOSPITAL ST.

BANGOR
106 HOGAN ROAD, SUITE 6
BANGOR, MAINE 04401
(207) 941-4570 FAX: (207) 941-4584

PORTLAND
312 CANCO ROAD
PORTLAND, MAINE 04103
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE
1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, MAINE 04769
(207) 764-0477 FAX: (207) 760-3143

C. Application Classification

This amendment will not increase emissions of any pollutant. Therefore, this modification is determined to be a minor revision and has been processed as such.

II. **BEST PRACTICAL TREATMENT (BPT)**

A. Introduction

In order to receive a license, the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in *Definitions Regulation*, 06-096 CMR 100 (as amended). Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

BPT for new sources and modifications requires a demonstration that emissions are receiving Best Available Control Technology (BACT), as defined in *Definitions Regulation*, 06-096 CMR 100 (as amended). BACT is a top-down approach to selecting air emission controls considering economic, environmental and energy impacts.

B. Process Emissions

IP has requested that the air emission license reflect the removal of the existing two color Flexo Folder Gluer. The existing gluer will be replaced with a new three color Flexo Folder Gluer, which is to be installed in the September – October 2014 timeframe. The new Flexo Folder Gluer will give the facility a higher run rate, as well as registration improvements and a higher operating flexibility.

The new three color Flexo Folder Gluer will require additional ink usage, as compared to the existing unit due to the new gluer having a higher run rate and being a three colored machine unit. Per air emission license A-461-71-L-A (issued December 12, 2012), IP is limited to 11.1 tons per year of VOC emissions and 9.9 tons per year of HAP emissions from the Printing/Inks process emissions, based on a 12-month rolling total. The projected ink consumption of the new Flexo Fold Gluer, as well as all other printing equipment at the facility will not exceed these current annual VOC and HAP emission limits. As of December 2013, the rolling total of VOC emissions from the Printing/Inks process equipment was only 0.294 tons.

Therefore, the removal of the existing two color Flexo Folder Gluer and addition of the three color Flexo Folder Gluer, will not results in any increase to the licensed emission limits. BPT for the Printing/Inks process emissions will remain

the same as was licensed in A-461-71-K-R/A (issued April 6, 2012) and shown below:

1. Printing/Inks

IP uses a variety of inks to print the outside of the containers. Assuming a maximum total quantity of 30,000 gallons of ink with an average VOC content of 0.74 lb VOC/gallon by weight is used per year, and that the inks volatilize completely, IP shall not exceed 11.1 tons/year of VOC emitted from the Printing process, on a 12-month rolling total.

Some of the printing inks contain HAPS in varying quantities. IP shall not exceed 9.9 tons/year of total HAPS, on a 12-month rolling total from the Printing process. The HAP limits are based on representative ink use and HAP content data.

Compliance with the VOC and HAP emission limits shall be documented on a mass balance basis.

C. Annual Emissions

1. Total Annual Emissions

IP shall be restricted to the following annual emissions, based on a 12-month rolling total. The tons per year limits remain the same as was licensed in A-461-71-L-A (issued December 12, 2012).

Total Licensed Annual Emissions for the Facility
Tons/year
(used to calculate the annual license fee)

	PM	PM ₁₀	SO ₂	NO _x	CO	VOC	HAP
Boilers	8.5	8.5	22.3	21.3	6.4	1.5	-
Printing	-	-	-	-	-	11.1	9.9
Folding/Gluing	-	-	-	-	-	2.0	-
Total TPY	8.5	8.5	22.3	21.3	6.4	14.6	9.9

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ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that the emissions from this source:

- will receive Best Practical Treatment,
- will not violate applicable emission standards, and
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants Air Emission License A-461-71-M-M pursuant to the findings of fact of this license amendment. This amendment warrants no new license conditions. IP shall continue to be subject to the standard and specific conditions found in Air Emission License A-461-71-K-R/A and in amendment A-461-71-L-A.

DONE AND DATED IN AUGUSTA, MAINE THIS 21 DAY OF May, 2014.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY:

Marc Allen Robert Cone for
PATRICIA W. AHO, COMMISSIONER

The term of this amendment shall be concurrent with the term of Air Emission License A-461-71-K-R/A.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 4/14/2014

Date of application acceptance: 4/16/2014

Date filed with the Board of Environmental Protection:

This Order prepared by Allison M. Hazard, Bureau of Air Quality.

